27

28

1 LIPSON, NEILSON, COLE, SELTZER & GARIN, P.C. Joseph P. Garin (Bar No. 6653) 2 Megan H. Hummel (Bar No. 12401) 9900 Covington Cross Drive, Suite 120 3 Las Vegas, Nevada 89144 (702) 382-1500/FAX (702) 382-1512 4 igarin@lipsonneilson.com mhummel@lipsonneilson.com 5 Robert T. Eglet (Bar No. 3402) 6 Erica D. Entsminger (Bar No. 7432) **EGLET PRINCE** 7 400 South Seventh Street, #400 Las Vegas, Nevada 89101 8 (702) 450-5400/FAX (702) 450-5451 9 eservice@egletlaw.com 10 Attornevs for Defendant Dennis Prince 11 12

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

CENTURY SURETY COMPANY, a foreign corporation;	) Case No.: 2:16-cv-02465-JCM-PAL )	
Plaintiffs, )	) STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO	
v.  DENNIS PRINCE, GEORGE RANALLI, and	DEFENDANT DENNIS PRINCE'S SPECIAL MOTION TO DISMISS PURSUANT TO NRS 41.660	
SYLVIA ESPARZA,	(First Request)	
Defendants. )		

Plaintiff Century Surety Company, and Defendant Dennis Prince, by and through their respective counsel, hereby agree and stipulate as follows:

IT IS HEREBY AGREED AND STIPULATED, that the deadline for Plaintiff Century Surety Company to respond to Defendant Dennis Prince's Special Motion to Dismiss Pursuant to NR 41.660, filed on December 5, 2016 (ECF No. 17), shall be extended until **January 5, 2017.** The current deadline is on December 22, 2016.

1

## Case 2:16-cv-02465-JCM-PAL Document 29 Filed 12/13/16 Page 2 of 2

	1	Pursuant to Local Rule IA 6-1, the	parties state the reason for the extension is	
	2	due to the need for additional time for coordination among Plaintiff's local and out-of-		
	3	state counsel in view of the incoming holidays. The parties have entered into the		
	4	agreement in good faith and not for purposes of delay. This is the parties' first request		
	5	for an extension.		
	6	DATED this 12 <sup>th</sup> day of December, 2016.	Dated this 12 <sup>th</sup> day of December, 2016.	
	7 8	CHRISTIAN KRAVITZ DICHTER, JOHNSON & SLUGA, LLC	LIPSON, NEILSON, COLE, SELTZER & GARIN, P.C.	
	9	/s/ Martin J. Kravitz  By:	/s/ Joseph P. Garin By:	
	11	Martin J. Kravitz, Esq. 8985 S. Eastern Avenue, Suite 200 Las Vegas, NV 89123	Joseph P. Garin, Esq. Megan H. Hummel, Esq. 9900 Covington Cross Dr., Ste.120	
Las Vegas, Nevada 89144 (702) 382-1500 – fax (702) 382-1512	12	mkravitz@ksjattorneys.com	Las Vegas, Nevada 89144 <a href="mailto:jgarin@lipsonneilson.com">jgarin@lipsonneilson.com</a>	
	13	Maria Louise Cousineau, Esq. COZEN O'CONNOR	mhummel@lipsonneilson.com	
	14 15	601 S. Figueroa Street, Suite 3700 Los Angeles, CA 90017 mcousineau@cozen.com	Robert T. Eglet (Bar No. 3402) Erica D. Entsminger (Bar No. 7432) Eglet Prince	
	16 17	J. Ric Gass, Esq. Michael B. Brennan, Esq.	400 South Seventh Street, #400 Las Vegas, Nevada 89101 (702) 450-5400/FAX (702) 450-5451	
(3	18	GASS WEBER MULLINS LLC 309 North Water Street, 7 <sup>th</sup> Flr.	eservice@egletlaw.com Attorneys for Defendant	
	19	Milwaukee, WI 53202 gass@gwmlaw.com	Dennis Prince	
	20	<u>brennan@gwmlaw.com</u> Attorneys for Plaintiff		
22	21	Century Surety Company		
	22		ODDED	
	23		<u>ORDER</u>	
	24	IT IS SO ORDERED.  DATED December 13, 2016.		
	25	DATED December 13, 2010.		
	26		Xellus C. Mahan	
	27	Ū	NITED STATES DISTRICT JUDGE	

Lipson, Neilson, Cole, Seltzer & Garin, P.C. 9900 Covington Cross Drive, Suite 120

28